

<p style="text-align: right;">Page 6</p> <p>1 services degree. It's not criminal justice. So I</p> <p>2 have a Bachelor's in human services from</p> <p>3 Springfield College.</p> <p>4 Q. Okay. And what position -- to what</p> <p>5 position were you hired with the New Hampshire</p> <p>6 Department of Corrections?</p> <p>7 A. Corrections officer.</p> <p>8 Q. Okay. And how long were you a</p> <p>9 corrections officer?</p> <p>10 A. Not counting corporal, just corrections</p> <p>11 officer, would be from '93 to '98.</p> <p>12 Q. And were you promoted from that position?</p> <p>13 A. Yes, from a correctional officer to</p> <p>14 corrections corporal in 2008.</p> <p>15 Q. And --</p> <p>16 A. I'm sorry. 1998. Sorry. Right. So</p> <p>17 from '93 to '98 I was a CO, and then from CO to</p> <p>18 corporal in '98.</p> <p>19 Q. And in '98 you were promoted to security</p> <p>20 officer?</p> <p>21 MR. FREDERICKS: Objection to form. Go</p> <p>22 ahead. You can answer.</p> <p>23 A. Corrections corporal.</p>	<p style="text-align: right;">Page 8</p> <p>1 Inmate claims, property claims. Warden's</p> <p>2 designee, so whatever the warden needed me to fill</p> <p>3 in or do in the warden's absence.</p> <p>4 Q. Was one of your responsibilities to</p> <p>5 oversee monitoring of cameras or video in the</p> <p>6 Northern Correctional Facility?</p> <p>7 MR. FREDERICKS: Objection to form. You</p> <p>8 can answer.</p> <p>9 A. It wasn't my job to review cameras or</p> <p>10 monitor cameras.</p> <p>11 Q. Were you required -- was one of your</p> <p>12 responsibilities to oversee correctional officers</p> <p>13 in monitoring cameras at the Northern Correctional</p> <p>14 Facility?</p> <p>15 A. Well, one of the jobs of a correctional</p> <p>16 officer is to monitor cameras, so -- and I</p> <p>17 supervised officers.</p> <p>18 Q. Okay. Was one of your responsibilities</p> <p>19 to discipline officers who performed poorly in</p> <p>20 their officer's responsibilities?</p> <p>21 A. The only person who can issue discipline</p> <p>22 is the warden of the facility.</p> <p>23 Q. Okay. Was one of your responsibilities</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. Okay.</p> <p>2 A. So I'm still a corrections officer.</p> <p>3 Q. Okay.</p> <p>4 A. But promoted to the rank of corrections</p> <p>5 corporal in 1998.</p> <p>6 Q. And what's your current title? Your</p> <p>7 current title -- what was your most recent title?</p> <p>8 A. With Corrections?</p> <p>9 Q. Strike that. In August of 2012 what was</p> <p>10 your position held with New Hampshire Department</p> <p>11 of Corrections?</p> <p>12 A. Corrections captain, chief of security.</p> <p>13 Q. Okay. And what did that position entail?</p> <p>14 A. So I had a lot of responsibilities in</p> <p>15 that position. Supervising the shift commanders</p> <p>16 along with the operations sergeants. Attending</p> <p>17 meetings for -- with the warden as the warden's</p> <p>18 designee. Meetings with Programs. Reviewing</p> <p>19 reports. Reviewing inmate job changes. Rounds.</p> <p>20 Emergency management coordinator for the facility.</p> <p>21 A PREA coordinator for the facility. Reviewing</p> <p>22 and answering inmate request slips. Inmate</p> <p>23 disciplinary appeals, I would review those.</p>	<p style="text-align: right;">Page 9</p> <p>1 to evaluate officers in the performance of their</p> <p>2 work?</p> <p>3 A. Yes.</p> <p>4 Q. You mentioned that one of your</p> <p>5 responsibilities as a correctional officer was</p> <p>6 rounds.</p> <p>7 MR. FREDERICKS: Objection to form. You</p> <p>8 can answer whenever I object, unless I say</p> <p>9 otherwise.</p> <p>10 Q. What in your mind was the proper way to</p> <p>11 conduct rounds?</p> <p>12 A. Well, the officer's responsibilities to</p> <p>13 conduct rounds is, to whatever area that may be,</p> <p>14 wherever they're assigned to for the day, is they</p> <p>15 observe the environment. They observe the</p> <p>16 atmosphere. You know, if they smell anything, see</p> <p>17 anything, any sanitation issues, any suspicious</p> <p>18 activity and, you know, it's just their job to</p> <p>19 address any issues that they may see during those</p> <p>20 rounds.</p> <p>21 Q. What in your mind constitutes suspicious</p> <p>22 activity?</p> <p>23 A. Cell-hopping, inmates in and out of</p>

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1 shift commander follows with the video, then  
2 that's what happened, so...  
3 Q. Whose job is it to preserve the video?  
4 A. Whose job is it to preserve the video?  
5 So there's no policy or procedure on the process  
6 for preserving the video. So in a case where  
7 there's a serious incident like this, the shift  
8 commander would review the video, and then that  
9 video gets -- and honestly, I'm not even sure how  
10 it gets to Investigations, whether it's downloaded  
11 and forwarded or there's an e-mail to  
12 Investigations to say, you know, this block of  
13 time on the video is the time for the incident. I  
14 can't remember specifically. I'm not sure how  
15 that actually goes to them for review.  
16 Q. So it's the shift commander's  
17 responsibility --  
18 A. Yes.  
19 Q. -- to preserve the video?  
20 A. If there's an incident on the shift, the  
21 shift commander is responsible for all evidence  
22 and for any incident. So whether it's a bloody  
23 inmate sock or if -- anything related like that,

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1 it's the shift commander's responsibility to make  
2 sure that stuff is secured, yes.  
3 Q. Isn't it your responsibility to supervise  
4 the shift commander?  
5 A. Yes.  
6 Q. Okay. So ultimately, isn't it your  
7 responsibility to preserve the video if the shift  
8 commander does not?  
9 A. If the shift commander doesn't secure it?  
10 Q. Right. Isn't it ultimately your  
11 responsibility? If you supervise the shift  
12 commander.  
13 A. Okay.  
14 Q. And the shift commander doesn't do his  
15 job in preserving the video, isn't that ultimately  
16 your failure in supervision?  
17 A. So if I observe -- if I read in the  
18 report that there was a serious incident that  
19 happened and there's no mention in there anywhere  
20 of a video or a video whatsoever, yes, it's my job  
21 to go back to the shift commander and say, where's  
22 the video? Was there video? Was there any video  
23 reviewed? Was there any video taken? Does

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1 Investigations know? All to those things.  
2 So, you know, yes, I would question if  
3 there was an incident and there was no video, and  
4 I would go back to the shift commander and say,  
5 where's the video? Oh, I forwarded it to  
6 Investigations. Why is that not in your report?  
7 Oh, I forgot to put it. That could be a scenario  
8 also.  
9 Q. Right. So it was your job to ensure that  
10 the video was preserved then?  
11 MR. FREDERICKS: Objection to form. Go  
12 ahead.  
13 A. So -- so ultimately, the review of the  
14 incident and if there was a video and it was not  
15 secured, then, yes, I would go back to say,  
16 where's the video, where's the footage and, you  
17 know, what happened?  
18 Q. Okay.  
19 A. So, yeah, my follow-up to that would be.  
20 But if I see in the report that the video was  
21 provided to Investigations, I don't go back to  
22 make sure that every little step to that was  
23 followed. So I take it at the shift commander's,

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1 you know, writing that he forwarded that video to  
2 the Investigations and we're moving on. Okay.  
3 Good. The video went to Investigations. That's  
4 great. If there was one available.  
5 Q. And after the video is transferred to the  
6 investigator, you're hands off in terms of video?  
7 A. Yeah. Yup.  
8 Q. Are you aware of what training  
9 correctional officers working at New Hampshire  
10 Northern New Hampshire Correctional Facility or  
11 August 24th, 2012, received in doing rounds?  
12 A. The training that they received in doing  
13 rounds?  
14 Q. Um-hum.  
15 A. Not to my knowledge. If they received  
16 any training, I don't know what training that  
17 would be. I wouldn't be aware of it. If there  
18 was a trainee on that day assigned to a field  
19 training officer and then they got trained, then  
20 that would be that scenario. So I don't know of  
21 any regularly badged officers that received  
22 training on rounds that day or any other day after  
23 their appeal program or...